



September 24, 2007

Robert Sydney
100 Cambridge Street, Suite 1020
Boston, MA 02114.

RE: Comments on MA RGGI Rules

Mr. Sydney:

On behalf of ICLEI-Local Governments for Sustainability and our 35 local government members in the Commonwealth of Massachusetts, I commend the state for taking a leadership role in addressing global climate change through participation in the Regional Greenhouse Gas Initiative.

Massachusetts has developed a strong draft rule and we appreciate the opportunity to provide input to you on this rule. Firstly, we highly encourage the Commonwealth to remove the cap from the retirement of allowances through voluntary purchases of renewable energy. Many of our member communities have actively sought opportunities to purchase or install clean renewable energy and would benefit greatly from the retiring of all of these allowances. Clean energy is our future and a limit should not be placed here.

Additionally, our local government members have been making tremendous strides to reduce energy and emissions from their own operations and encouraging their community members to do the same. We would like to see a streamlined system to approve qualified municipal offset programs as part of this rule.

Thank you for your time.

Best,

A handwritten signature in black ink, appearing to read 'Kim Lundgren', with a long, sweeping horizontal stroke at the end.

Kim Lundgren
Regional Director
ICLEI USA

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